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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No. Ex Parte 704

REVIEW OF COMMODITY, BOXCAR, AND TOFC/COFC EXEMPTIONS

**COMMENTS OF THE
FORD MOTOR COMPANY**

Ford Motor Company appreciates the opportunity provided by the Surface Transportation Board ("Board") to submit written comments for the hearing on February 24, 2011.

Ford North America is a substantial rail user for finished vehicle deliveries and automotive parts logistics. Approximately 70% of our produced vehicle volume is transported by rail, and approximately 10% of auto components travel by rail. Consequently, we have a high reliance on the rail transportation system in the execution of our business in North America. Having said that, we are not submitting specific issues or concerns that we believe require the Surface Transportation Board intervention to solve. We are, however, interested in hearing the debate regarding the pros and cons of revoking existing commodity exemptions in the context that doing so may promote competition without constraint, and provide for remedies where they may be appropriate. The consolidation of railroads over time, combined with the inherent constraints associated with railroad owned infrastructure have resulted in limited opportunity for competition. And though trucking provides a transportation alternative, it is not a viable economic alternative to rail on balance, and we at Ford have a keen interest in ensuring a highly competitive transportation landscape.

For those reasons, therefore, we support the proposed hearings and appreciate the opportunity to submit comment.

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